



April 6, 2022

Joseph A. Iemma

**By ECF**

Hon. John P. Cronan  
United States District Court  
Southern District of New York  
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New York, NY 10007

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Re: *Deborah Goodman vs. Clarifai, Inc.*  
1:22-cv-02280

Dear Hon. Cronan

Please accept this letter as a request by the undersigned, counsel for Defendant Clarifai, Inc., for an extension of time pursuant to Section 3B of your Honor's Individual Rules.

Defendant respectfully requests an extension of time to file a motion to transfer venue from the Southern District of New York to the District of Delaware. Defendants request an extension to May 4, 2022 due to various professional and personal (including one team member's child's surgery) commitments taking place in the month of April. This is Defendants first request for such an extension.

In conjunction with the above request, Defendant also seeks an extension of time to file its responsive pleading under F.R.C.P 12 from the current deadline for April 14, 2022 to 28 days following an Order deciding the transfer motion.

Plaintiff's counsel does not oppose this extension request.

I thank the Court for its attention to this request.

Respectfully,

/s/ Joseph Iemma

Joseph Iemma

cc: Schuyler Ufkes, Esq.